

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

**MARK E. BUTLER,
defendant**

No. 1:21-cr-202-PB-01

**18 U.S.C. §§ 2252A(a)(2) & (b)(1)
18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)
18 U.S.C. § 2253(a)**

INDICTMENT

The Grand Jury Charges:

COUNT ONE

18 U.S.C. §§ 2252A(a)(2) & (b)(1)
[Distribution of Child Pornography]

On or about September 22, 2021, in the District of New Hampshire and elsewhere, the defendant,

MARK E. BUTLER,

knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been transported in and affecting interstate commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT TWO

18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)
[Possession of Child Pornography]

On or about October 13, 2021, in the District of New Hampshire, the defendant,

MARK E. BUTLER,

knowingly possessed material which contained an image of child pornography, as defined in Title

18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, and which had been transported in and affecting interstate commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

NOTICE OF FORFEITURE

Pursuant to Federal Rule of Criminal Procedure 32.2, and upon conviction on Count One and/or Count Two, the defendant,

MARK E. BUTLER,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), any and all matter which contains visual depictions of minors engaged in sexually explicit conduct in violation of Title 18, United States Code, Section 2251 and 2252A; any property constituting or traceable to gross profits or other proceeds the defendant obtained directly or indirectly as a result of the above-charged offense; and any and all property used or intended to be used in any manner or part to commit or to promote the commission of such offense, specifically (1) an ASUS laptop, (2) iMix laptop, and (3) an Apple iPhone 7.

A TRUE BILL

Date: December 20, 2021

/s/ Grand Jury Foreperson
Grand Jury Foreperson

JOHN J. FARLEY
Acting United States Attorney

/s/ Cam T. Le
Cam T. Le
Assistant United States Attorney